



CITY OF LOMPOC

January 16, 2014

Mr. Peter Brostrom
Water Use and Efficiency Branch
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: Comments-Independent Technical Panel (ITP) on Demand Management Measures
Required in Urban Water Management Plans (UWMPs)

Dear Mr. Brostrom:

Thank you for the opportunity to provide comments to you concerning the ITP Demand Management Measure proposals. The City of Lompoc (City) is located in Santa Barbara County and is required to prepare an Urban Water Management Plan (UWMP). Lompoc has approximately 9,867 Water connections and an approximate population of 39,151. Based on the 20% reduction by 2020 Water Conservation requirement, the City's service area lies in the Department of Water Resources (DWR) Hydrologic Region 3 (Central Coast). The City has an extensive water conservation program that began in the 1980s and the City has met the mid-term SBX 7X water conservation requirements.

The City has reviewed recommendations made by the ITP and submits the following comments with the proposed changes to the Demand Management Measures (DMMs).

1. Recommendation #1: Amend the Urban Water Management Planning Act to Simplify and Update the Demand Management Measure Reporting

The City of Lompoc supports this recommendation and agrees that some of the 14 Demand Management Measures (DMMS) are outdated due to legislative or code changes, advances in water efficient devices or appliances and that these measures should be simplified.

2. Recommendation #2: Require Distribution System Water Loss Reporting to Urban Water Management Plans

The City does not support adding the annual calculation of distribution system water loss as a new required water use sector. The recommendation mentions that the first step for the reduction of these losses is a water audit. The City agrees that a distribution water audit has

merit, but does not agree that agencies with less than ten percent (10%) water loss should be required to annually complete this audit, using the American Water Works Association (AWWA) methodology.

3. Recommendation #3: Authorize the Department of Water Resources to Require Electronic Filing of Urban Water Management Plans (UWMPs), Including Standardized Forms

The City supports electronic filing of UWMPs. The City does not support the ITP proposal to require the use of standardized forms, tables, or displays of water demand management measures and require DWR to approve the information that is submitted. DWR does not have the time or resources to accomplish this requirement.

4. Recommendation #4: Voluntary Reporting on Projected Water Savings from codes, Standards, Ordinances and Transportation and Land Use Plans Affecting an Urban Water Supplier's Service Area

The City does not support this recommendation, because water savings are currently calculated from water conservation programs and are evident in water usage through gallons per capita per day calculations. This is not worth the effort for the urban water supplier, because it is very labor intensive and in the end will become nothing more than a default provided by DWR.

Recommendation #5: Voluntary Inclusion of Energy Intensity in Urban Water Management Plans

The City is not in favor of calculating the energy intensity of urban water deliveries, because when calculating embedded energy, there are multiple factors involved that vary from agency to agency. Also, the proposed new additional reporting requirement is beyond the focus of the Urban Water Management Plans and will require additional unnecessary staff time to complete these calculations.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Bean", with a stylized flourish at the end.

Larry Bean, Utilities Director

Cc: Patrick Wiemiller, City Administrator